

March 29, 1999

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Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Re: Docket # 98N-1038, "Irradiation in the Production, Processing, and Handling of Food"

To Whom It May Concern:

I would like to respond to questions posed regarding the irradiated foods labeling issue. I have listed the questions as posted on your website, and responded to each.

(1) Does the current radiation disclosure statement convey meaningful information to consumers in a truthful and nonmisleading manner?

The current radiation disclosure statement does convey truthful and meaningful information, and is not misleading to consumers. The use of the word "irradiated" or "irradiation", as opposed to "cold pasteurization" or "electronic pasteurization", is especially important. The two processes are different, and have different effects on food nutrition, shelf life, and chemical makeup.

(2) How do consumers perceive the current radiation disclosure statement--as informational, as a warning, or as something else?

I believe consumers perceive the current statement as informational, but with ominous overtones. This is because of society's perception of the word "radiation", which is loosely associated with radioactive materials and nuclear energy.

(3) Does the wording of the current radiation disclosure statement cause "inappropriate anxiety" among consumers? What are examples of "inappropriate anxiety"?

Some level of anxiety can be expected because of the general public's connotations of the word "irradiated" or "irradiation", but it is not inappropriate. If that is the most accurate word to describe the process, then any other phrase or word would be misleading.

Examples of inappropriate anxiety would include people refraining from contact with all foods due to news of "mad cow disease", or the reactions caused in consumers by placing a skull and crossbones symbol (commonly associated with poisons) on irradiated food.

(4) What specific alternate wording for a radiation disclosure statement would convey meaningful information to consumers, in a truthful and nonmisleading manner, and in a more accurate or less threatening way than the current wording?

None. The current wording is sufficient, accurate, and factual.

(5) Would consumers be misled by the absence of a radiation disclosure statement in the labeling of irradiated foods? Are consumers misled by the presence of such a statement?

Consumers would definitely be misled by the absence of a statement, as it has been proven to have nutritional effects on certain foods. If the very chemical makeup of a food has been altered, people should have the right to be informed of such changes. Consumers would not be misled by the presence of such a statement. It serves to inform them of the processes the food that is going into their bodies has undergone. If the process remains, the labeling should remain.

(6) With respect to foods containing irradiated ingredients, are consumers misled by the absence of a radiation disclosure statement? Would consumers be misled by the presence of such a statement?

The same situation applies here as did in question five. People have a right to know what has been done to the foods they eat. Granted, varying proportions of irradiated ingredients will produce varying effects within a food product. The fact remains that some portion of that food product has

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been irradiated, and people would only be misled by the absence of an irradiation statement and symbol.

(7) What is the level of direct consumer experience with irradiated foods that are labeled as such?

Being a strict vegetarian, I personally never come into contact with the label, and I seriously doubt that the vast majority of the public has ever seen the symbol/labeling. Most people probably do not even know food irradiation exists. This gives more reason to clearly inform people of what is being done to their foods.

(8) What is the effect of the current required labeling on the use of irradiation? Does the current required labeling discourage the use of irradiation?

Not knowledgeable in this area.

(9) What do consumers understand to be the effect of irradiation on food? For example, what do consumers understand about the effect of irradiation on the numbers of harmful microorganisms in or on food?

My educated guess would be that consumers think irradiation involves subjecting food to an x-ray-type particle stream that reduces bacteria and other microorganisms in the food.

(10) Do consumers readily recognize the radura logo?

Most probably do not readily recognize the logo. I am employed as a formally trained graphic designer with four years of practical working experience. The logo only depicts the process in an iconized, simplified way, which is to be expected. A logo cannot tell the whole story behind food irradiation, but will gain meaning as consumers become acquainted with it through daily contact, and consistent use and placement of the logo on products.

(11) Do consumers understand the logo to mean that a food has been irradiated?

At this early stage, the logo by itself does little to communicate "irradiated food" to a consumer. It must be accompanied by the statement. But even as some consumers come to associate the logo alone with irradiated foods, the wording must remain intact, along with the logo, to inform those first coming into contact with such foods, i.e., immigrants, children, or foreign visitors.

(12) Do consumers perceive the radura logo as informational, as a warning, or as something else?

See question two. A similar situation applies, as the logo and written information are closely linked. The logo by itself seems to evoke a more friendly or natural feel. It has visual cues indicating plants, growth, and sunshine. By itself, the logo does not appear to be a warning. Unattached to any verbiage, it could conceivably mean "grown in the sun", "greenhouse raised", or something similar. Color usage in the logo will be a big factor in consumers' perception of the logo's meaning.

(13) Should any requirement for a radiation disclosure statement expire at a specified date in the future?

Absolutely not. If the contents have been irradiated, the statement and logo should be displayed. The most appropriate means of doing so for this type of process would be on the front panel of the food package, near the product name. This will allow consumers to easily see the statement/logo, and be informed of its use, from the shelf. In the case of non-packaged foods, the statement/logo should be displayed on the shelf edge directly below the product, near the price, or on a poster adjacent to the display.

(14) If so, on what criteria should the expiration be based?

N/A

(15) If the expiration of labeling requirements for irradiated foods is to be based on consumer familiarity with the radura logo and understanding of its meaning, what evidence of familiarity and understanding would be sufficient to allow these requirements to expire?

None. There will always be segments of the population that have never come into contact with this process or labeling, such as the aforementioned immigrants, children, etc. No expiration of the labeling requirements should be allowed, as new consumers will not be made directly aware of the irradiation process existent in specific foods which they purchase.

Thank you for your time.



Tyler Galloway



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Immediate attention required?

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Message:

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